

EXHIBIT P-16

Notice to Submit Motion for Access to Employment Records

Gregory M. Constantino, (A 6853)
CONSTANTINO LAW OFFICE, P.C.
8537 South Redwood Road, Suite D
West Jordan, UT 84088
(801) 748-4747 or (877) 318-4747
legal@constantinolaw.com
Attorney for Plaintiff

SECOND JUDICIAL DISTRICT COURT

DAVIS COUNTY, FARMINGTON DEPARTMENT

LVNV Funding LLC Plaintiff, vs. Luis Gallegos, an individual , Defendant.	NOTICE TO SUBMIT FOR DECISION Case No.: 149700262 Judge: DAVID CONNORS
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COMES NOW, Plaintiff LVNV Funding LLC, by and through its attorney, Gregory M. Constantino, and, pursuant to Rule 7(d) of the Utah R. of Civ. P., gives notice that Plaintiff's MOTION FOR ORDER TO PERMIT ACCESS TO DEFENDANT'S EMPLOYMENT RECORDS is ready for decision. Plaintiff served Plaintiff's MOTION FOR ORDER TO PERMIT ACCESS TO DEFENDANT'S EMPLOYMENT RECORDS on March 6, 2014. Defendant did not file a response to the MOTION FOR ORDER TO PERMIT ACCESS TO DEFENDANT'S EMPLOYMENT RECORDS. The State of Utah, Department of Workforce Services did not file a response to the MOTION FOR ORDER TO PERMIT ACCESS TO DEFENDANT'S EMPLOYMENT RECORDS. No hearing is needed for this, as the statute is clear. The matter is ripe for decision. The ORDER TO PERMIT ACCESS TO DEFENDANT'S EMPLOYMENT RECORDS, which was previously served on the Defendant and on the Department of Workforce Services, is ready for entry by the Court.

Respectfully signed and submitted March 28, 2014.

/s/Gregory M. Constantino
Gregory M. Constantino

CERTIFICATE OF MAILING/DELIVERY

I, the undersigned, hereby certify that a true and correct copy of the foregoing **NOTICE TO SUBMIT FOR DECISION**, was on this day March 31, 2014, mailed first class, postage prepaid to:

Luis Gallegos
2261 N 450 W
CLEARFIELD UT 84015-3529

I certify that on March 31, 2014, a true and correct copy of the foregoing NOTICE TO SUBMIT FOR DECISION was served upon counsel for the Department of Workforce Services, Kathleen Bounous as required by Ut. R. Civ. P. 5(b)(1)(A)(ii) (“ . . . by sending it by email to the person’s last known email address if that person has agreed to accept service by email.” In this instance, the Department of Workforce Services has agreed to accept service of motions filed under Utah Code Annotated 35A-4-314, and all other corresponding documents associated with such motions, via email, at the agreed upon email addresses of: kbounous@utah.gov and mlmartinez@utah.gov

/s/Luisa F Ocampo
Luisa F Ocampo